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7 **Attorney for Defendant, JASON ERIC JOHNSON**

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 * * * *

11 **UNITED STATES OF AMERICA**)
12)
13 **Plaintiff,**)
14)
15 **v.**)
16)
17 **JASON ERIC JOHNSON**)
18 **RICKY RICARDO PLAZOLA**)
19)
20 **Defendant.**)
21)

22 **2:13-cr-00395-GMN-GWF**

23 **STIPULATION TO CONTINUE PRETRIAL MOTION DEADLINES AND**
24 **[PROPOSED ORDER]**

25 **(Fourth Request/Second Request Since Superseding Indictment)**

26 **IT IS HEREBY STIPULATED and AGREED** by and between Robert Knief, Assistant
27 United States Attorney, Richard A. Schonfeld, Esq., attorney for Defendant Jason Eric Johnson and
28 John Spilotro, Esq., attorney for Defendant Ricky Ricardo Plazola that the parties shall have to and
including February 2, 2015, within which to file Defendants' additional pretrial motions.

IT IS FURTHER STIPULATED AND AGREED, by and between the parties herein, that
they shall have to and including February 16, 2015, within which to file any and all responsive
pleadings.

1 **IT IS FURTHER STIPULATED AND AGREED**, by and between the parties herein that
2 they shall have to and including, February 23, 2015, within which to file any and all replies to said
3 motions.
4

5 This Stipulation is entered into for the following reasons:

6 1. That Counsel for the Government filed a Superseding Indictment against the
7 Defendants on October 28, 2014, and as a result thereof Defendants need additional time to
8 adequately research, prepare, and submit for filing appropriate motions and responses, taking into
9 account the exercise of due diligence;
10

11 2. That Counsel for Defendants are still awaiting additional discovery from the
12 government related to the new charges;
13

14 3. That the Government has no objection to the continuance;

15 4. Denial of this request for continuance of the pretrial motions deadlines, response
16 deadlines and trial date would deny counsel for both the government and Defendant sufficient time
17 within which to be able to adequately research, prepare, and submit for filing appropriate motions
18 and responses, taking into account the exercise of due diligence;
19

20 5. Additionally, denial of this request for continuance would result in a miscarriage of
21 justice;
22

23 6. For all the above-stated reasons, the ends of justice would best be served by a
24 continuance for the parties' pretrial motions and response deadlines;
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1 7. This is the fourth request to continue the pretrial motions on behalf of the
2 parties, but the second since the Superseding Indictment.

3
4 8. This stipulation will not affect the current trial date.

5 **DATED** this 29th day of December, 2014.

6 **UNITED STATES ATTORNEY**

CHESNOFF & SCHONFELD

7
8 /s/

/s/

9 **ROBERT KNIEF, AUSA**
10 333 Las Vegas Blvd. S.
11 Las Vegas, Nevada 89101
12 Attorney for Plaintiff

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Attorney for Defendant, Jason Eric Johnson

13
14 **SPILOTRO & KULLA**

15
16 /s/

17 **JOHN SPILOTRO, ESQ.**
18 626 South Third Street
19 Las Vegas, Nevada 89101
20 Tel: (702) 385-4994
21 Attorney for Defendant, Ricky Ricardo Plazola
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FINDINGS OF FACT, CONCLUSION OF LAW AND ORDER

Based upon the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. That Counsel for the Government filed a Superseding Indictment against the Defendants on October 28, 2014, and as a result thereof Defendants need additional time to adequately research, prepare, and submit for filing appropriate motions and responses, taking into account the exercise of due diligence;

2. That Counsel for Defendants are still awaiting additional discovery from the government related to the new charges;

3. That the Government has no objection to the continuance;

4. Denial of this request for continuance of the pretrial motions deadlines, response deadlines and trial date would deny counsel for both the government and Defendant sufficient time within which to be able to adequately research, prepare, and submit for filing appropriate motions and responses, taking into account the exercise of due diligence;

5. Additionally, denial of this request for continuance would result in a miscarriage of justice;

6. For all the above-stated reasons, the ends of justice would best be served by a continuance for the parties' pretrial motions and response deadlines;

7. This is the fourth request to continue the pretrial motions on behalf of the parties, but the second since the Superseding Indictment.

8. This stipulation will not affect the current trial date.

ORDER


IT IS HEREBY ORDERED that the parties herein shall have to and including February 2, 2015, to file any and all pre-trial motions.

IT IS FURTHER ORDERED that the parties herein shall have to and including February 16, 2015, within which to file any and all responsive pleadings.

IT IS FURTHER ORDERED that the parties herein shall have to and including February 23, 2015, within which to file any and all replies.

IT IS SO ORDERED.

DATED this 2nd day of January, 2015.



THE HONORABLE GLORIA M. NAVARRO
UNITED STATES DISTRICT JUDGE

Submitted by:

/s/

RICHARD A. SCHONFELD, ESQ.
Attorney for Jason Eric Johnson